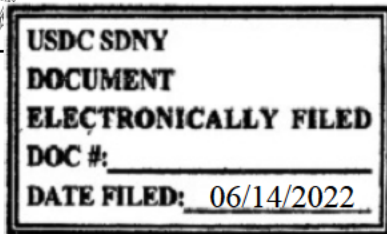


U.S. Department of Justice



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 14, 2022

By ECF

The Honorable Barbara C. Moses
United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *Binns-Harty-Bolt v. McDonough*, 21 Civ. 7276 (PAE) (BCM)

Dear Judge Moses:

This Office represents Denis McDonough, in his official capacity as Secretary of Veterans Affairs (the "Government") in the above-referenced employment discrimination action brought by *pro se* plaintiff Rinella C. Binns-Harty-Bolt ("Plaintiff"). The Government writes respectfully a one-week adjournment of the initial conference currently scheduled for June 15, 2022 (ECF No. 39).

The reason for this request is that when the undersigned contacted Plaintiff this afternoon to ensure that she would attend the initial pretrial conference scheduled for tomorrow, June 15, Plaintiff stated that she was unaware of the conference and would be unable to attend. Plaintiff stated that she has been denied electronic viewing, that the Government had not informed her that the conference had been rescheduled for June 15, and therefore she would be unable to attend the conference after finding out about it only one day before.

In light of the miscommunication and Plaintiff's unavailability to attend on such short notice, the Government respectfully requests that the initial conference be adjourned from June 15, 2022, to June 22 or 23, 2022, or to a date convenient to the Court. This is the Government's second request for an adjournment of the initial pretrial conference. Plaintiff consents to the request.

We thank the Court for its consideration of this request and apologize for the short notice and any inconvenience to the Court.

Respectfully,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/ Dana Walsh Kumar
DANA WALSH KUMAR
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Tel.: (212) 637-2741
Email: dana.walsh.kumar@usdoj.gov

CC: Rinella C. Binns-Harty-Bolt
145 4th Avenue
Apartment 4C
Manhattan, NY 10003

(by certified mail and email)

Application GRANTED. The initial case management conference scheduled for June 15, 2022, is hereby ADJOURNED to **June 24, 2022, at 10:00 a.m.**, in Courtroom 20A of the Daniel Patrick Moynihan United States Courthouse. The Clerk of Court is respectfully directed to mail a copy of this memorandum endorsement to the *pro se* plaintiff. SO ORDERED.



Barbara Moses
United States Magistrate Judge
June 14, 2022